

## 40. Devlin I

### **Question 1: Should Nation Radio Ltd be permitted to make its proposed changes to the Format of Nation Radio, with particular regard to the statutory criteria set out in Section 2 of this consultation document? (Section 106 (1A) of the 1990 Broadcasting Act, as amended, relating to Format changes).:**

I'm contacting you regarding the Format Request Change submitted by Nation Radio, owned by Town & Country Broadcasting Ltd. My response is non-confidential.

I'm responding as a resident and listener in the coverage area and as someone in the target demographic of the existing format. Whilst I have had previous involvement in the radio industry, this is a personal response and represents my personal opinion only and not those of any organisations I have previously represented.

I responded to a previous consultation regarding the format change proposed by Nation Radio published by Ofcom on 18/11/2009. At the time, whilst I did not specifically use the phrase "format creep" in my response that was my primary concern. The previous change as proposed would have led to a significant change in the station sound. As a result I particularly welcome the new proposal in returning to a rock focused station and removing the statement "Other compatible genres will complement the output" from the format, the addition of which has, I believe, resulted in dilution of the station, though retaining enough distinctiveness to be a viable and alternative format.

However, I'm concerned that this new proposal, without the existing defined age range of 15-34, would result in a significantly older sound and would result in a significant change that would be detrimental to the overall choice of radio stations available on all broadcast platforms in South Wales.

I am particularly concerned that there would be no obvious alternative to Nation Radio on broadcast platforms similar to its existing format should the request be granted. Since the closure of the MXR Severn Estuary multiplex in July and the XFM London, which was broadcasting on that multiplex, having not been transferred to an alternative multiplex, Nation Radio is the only youth oriented rock music station available in South Wales. Had XFM London relocated to an alternative multiplex, I would have no opposition to the proposed change as there would be an alternative station that provides a similar format to Nation Radio in its current format as licenced by OFCOM. However, since that is not the case, it leaves Planet Rock and Team Rock Radio as the only other rock music based stations available via a broadcast platform in South Wales, both of which in my opinion are targeted at older listeners. Should the format change be granted in its current form as proposed, Nation Radio would undoubtedly switch to a similar format, especially considering that certain tracks currently in rotation are, in my opinion, targeted at an older audience than Nation Radio is currently licenced to target.

I appreciate that on FM there are no alternatives to either the existing format or the new format proposed by Nation Radio. However, with digital migration being planned by the Government and digital radio listening increasing 4.4% year on year ([OFCOM Digital Radio Report, September 2013](#)) it would seem sensible to consider DAB radio stations as relevant when considering a format change to an FM station, especially since the 50% target that will trigger full digital migration seems likely to occur before the end of the decade if the current

adoption rate continues. As such, the proposed change would likely create another station with a similar format to existing stations available and without an alternative station to provide a youth oriented rock music focused station, I believe there would be a loss of choice in the South Wales area.

In closing, I would urge OFCOM to oppose any proposal to remove the age demographic from the station format. Allowing the removal would, in my opinion, result in a loss of choice.